

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

LAWRENCE MALLY, On Behalf of Himself
and All Others Similarly Situated,

Plaintiff,

-against-

QIAO XING UNIVERSAL TELEPHONE,
INC., RUI LIN WU, and ALBERT LEUNG,

Defendants.

Civil Action No. 1:07-CV-7097 (DLC)

MILTON PFEIFFER, On Behalf of Himself
and All Others Similarly Situated,

Plaintiff,

-against-

QIAO XING UNIVERSAL TELEPHONE,
INC., RUI LIN WU, and, ALBERT LEUNG,

Defendants.

Civil Action No. 1:07 CV-7252 (DLC)

[Additional Caption on Next Pages]

**NOTICE OF MOTION BY JAMES B. BALABAN FOR
APPOINTMENT OF LEAD PLAINTIFF AND APPROVAL OF LEAD COUNSEL**

Marc I. Gross (MG-8496)
Jeremy A. Lieberman (JL-1173)
**POMERANTZ HADEK BLOCK
GROSSMAN & GROSS LLP**
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New York, New York 10017
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Patrick V. Dahlstrom (PD-5328)
**POMERANTZ HADEK BLOCK
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Telephone: (312) 377-1181
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Attorneys for James B. Balaban

ISAAC FISHMAN, Custodian for the IBF
Foundation, on Behalf of itself and All Others
Similarly Situated,

Plaintiff,

-against-

QIAO XING UNIVERSAL TELEPHONE,
INC., WU RUI LIN, WU ZHI-YANG,
ALBERT LEUNG, SONNY KWOK WING
HUNG, ZE YUN MU, YI HONG ZHANG,
and GROBSTEIN HORWATH & CO., LLP

Defendants.

Civil Action No. 1:07-CV-7312 (DLC)

MICHAEL LOCKE, On Behalf of Himself and
All Others Similarly Situated,

Plaintiff,

-against-

QIAO XING UNIVERSAL TELEPHONE,
INC., RUI LIN WU, ALBERT LEUNG, ZHI
YANG WU, SONNY KWOK WING HUNG,
ZE YUN MU, YI HONG ZHANG, and
GROBSTEIN, HORWATH & COMPANY
LLP,

Defendants.

Civil Action No. 1:07-CV-7693 (DLC)

REUVEN LAPIN, Individually and On Behalf
of All Others Similarly Situated,

Plaintiff,

-against-

QIAO XING UNIVERSAL TELEPHONE,
INC., RUI LIN WU, and ALBERT LEUNG,

Defendants.

Civil Action No. 1:07-CV-7829 (DLC)

TO: ALL PARTIES AND THEIR COUNSEL OF RECORD

PLEASE TAKE NOTICE that, upon the accompanying Memorandum of Law in Support of James B. Balaban's Motion for Appointment of Lead Plaintiff and Approval of Lead Counsel, filed herewith, proposed Lead Plaintiff James B. Balaban hereby move this Court, the Honorable Denise L. Cote, in the United States District Court, Southern District of New York, Courtroom 11B, 500 Pearl Street, New York, New York, 10007, for an Order:

1. Pursuant to Section 21D(a)(3)(B) of the Securities Exchange Act of 1934, as amended by the Private Securities Litigation Reform Act of 1995:

(a) appointing James B. Baladan as Lead Plaintiff for the Class of shareholders who purchased or sold call options and purchased or sold put options on the common stock of Qiao Xing Universal Telephone, Inc. during the Class period of June 30, 2004 through July 16, 2007 and who were damaged thereby, and

(b) approving Lead Plaintiff's selection of Pomerantz Haudek Block Grossman & Gross LLP as Lead Counsel for the Class.

Dated: October 9, 2007

Respectfully submitted,

**POMERANTZ HAUDEK BLOCK
GROSSMAN & GROSS LLP**

/s

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